In the United States District Court for the District of Oregon

:

Kursten Owen (individually and :

d/b/a Elegance & Geekery LLC),

Plaintiff, Supplement to Plaintiff's Emergency

v. Motion for Order to Show Cause

Breana Askew (individually and :

d/b/a Breromi), Kiandria Demone Case No.: 6:25-cv-01272-AA

Boyce,

and Does 1-100, :

Defendants.

Supplement to Plaintiff's Emergency Motion for Order to Show Cause

Plaintiff Kursten Owen respectfully submits this supplemental filing to bring to the Court's attention new evidence demonstrating the continuing and foreseeable harm resulting from Defendant Kiandria Boyce's August 24, 2025 violation of the Court's

Preliminary Injunction (Doc. 39).

In support, Plaintiff states the following:

1. Subsequent to the filing of the original Emergency Motion and Plaintiff's first

supplement to the Emergency Motion, a third party—the same individual, known

online as @thecomplexrebel, who previously tied the Plaintiff's identity (Exhibit B)

- to Defendant Boyce's August 24, 2025 posts wherein third parties called for violence against the individual alluded to by Defendant Boyce (as outlined in Plaintiff's first supplement to the Emergency Motion)—posted a video further inciting harassment and disparaging the Plaintiff.
- 2. In @thecomplexrebel's recent video, posted on August 29, 2025, she makes claims such as: "Another woman named Kursten Owen allegedly copied her design, mimicked Bre's entire marketing...Within six days, before Bre or Kiandria had ever even been served, a federal judge gave a gag order. Even a UCLA law professor flagged that order as shaky...This is what modern colonization looks like, no? The invention is stolen. It's stolen from a black woman....The white woman is weaponizing the legal system to silence her...That court order might have gagged Bre and Kiandria, but you know what? Kursten, you cannot silence me. So I'm going to say her name again. Kursten Owen, I see what you're doing. We all see what you're doing." (Exhibit A)
- 3. Defendant Boyce's reposting and endorsement of the video addressed in the original Emergency Motion foreseeably and proximately caused the creation of the content conduct @thecomplexrebel's video and of and its widespread dissemination—currently sitting at nearly 67,000 views. This is especially true given defendant's praise of the prior video, her request that her followers "watch" and "amplify" that message, her statement that the video was "a good example to follow," and comment that "white people speaking up about it is exactly what we need right now" when reposting the video.

- 4. Given the timeline—Defendant Boyce's initial repost on August 24, 2025, the first public commentary by @thecomplexrebel naming Plaintiff on August 25, 2025 (Exhibit B), and now the post of a video by @thecomplexrebel on August 29, 2025—it is clear that @complexrebel was incited to create her content as a direct result of the violating posts made by Defendant Boyce on August 24, 2025.
- 5. @thecomplexrebel has further stated, based on misrepresentations by Defendant Boyce, that "Kursten Owen literally tried to have @kiandria arrested by filing an emergency motion asking a judge to hold her in contempt of court...How can anyone weaponize the legal system with this level of cruelty?...Kursten, this is hateful violence!...What Kursten is doing is suppression!" (Exhibit D). To be clear, a motion for contempt is not a request for incarceration, nor did Plaintiff request a contempt finding based on Defendant Boyce's generalized posts regarding "CARNAGE" and invitations for in-person confrontations. Those posts were included to show the basis for Plaintiff's reasonable fear of harm from Defendant Boyce harm that has already been perpetuated against Plaintiff's reputation as well as that of her business and her emotional well-being.
- 6. Defendant Boyce's repost and comments were part of an effort to rally others to harass, disparage, and publicly challenge Plaintiff personally and professionally, as well as the legitimacy of these proceedings, and these subsequent videos show Defendant was successful in doing so.
- 7. The August 24, 2025 injunction violation has caused and continues to cause irreparable harm to Plaintiff's personal reputation and professional goodwill in

addition to causing heightened public hostility, emboldened harassment by third parties, and escalating emotional distress to the Plaintiff.

- 8. Additional commentators have now taken this information as an invitation to utilize their positions as non-parties to the suit to make statements such as: "I'm not gagged. Kursten is not just a thief but also a coward" (Exhibit D).
- 9. In response to the posts made by @thecomplexrebel, Defendant Boyce went on to misrepresent the scope of the injunction and Plaintiff's requests. Defendant Boyce claimed in a comment "at first, there was a motion filed requesting that the judge stop me from talking about it altogether, but it was not granted" (Exhibit D). It is unclear what Defendant Boyce is referring to here. The only request Plaintiff made that was not granted was that defendants be barred from continuing to publicly defame Plaintiff.
- 10. Defendant Boyce then goes on: "The ONLY thing the TRO prevents us from doing is encouraging third parties to report her store for harassing her, which no one is doing." (Exhibit D). It is unclear if Defendant Boyce meant "or" when she typed "for," as the injunction clearly states that reporting of Plaintiff's store was simply given as an example of forms of harassment barred by the injunction.
- 11. Assuming Defendant Boyce meant "or," a reasonable person would understand that reposting defamatory and disparaging videos directly aimed at Plaintiff with comments that incite others to act against Plaintiff falls within prohibited harassment as outlined in the injunction.

- 12. This is because the injunction, as entered by this Court, prohibits "harassing conduct" directed at Plaintiff, including but not limited to "encouraging third parties to report plaintiff's stores." (Doc. 39 at 18). This language clearly targets conduct that is (a) directed specifically at Plaintiff or her business, (b) harms Plaintiff's business or personal interests, and (c) includes inciting or facilitating third-party harassment designed to pressure, intimidate, or damage Plaintiff's business operations and reputation—all actions that the court found resulted in irreparable harm to Plaintiff such as loss of business goodwill that the injunction was entered to protect against.
- 13. In fact, these posts have led to third party commentary confirming that, since the violating of the injunction, new reports have been made against Plaintiff and her business—the exact conduct defined as an example of harassment under the injunction (exhibit C).
- 14. Defendant Boyce went on to state in this comment that the case is "a total circus in my opinion, a waste of tax dollars," and further states the "issue" is that Plaintiff would even seek an injunction against her at all (exhibit D), despite the fact that the court rightfully found that defendants' actions warranted injunctive relief given the irreparable harm their actions have caused.
- 15. The ongoing harm extends beyond direct personal and reputational injury to Plaintiff; the undermining of the Court's authority and the validity of its injunction by third party references to them as "shaky;" comments calling on others to "look for a connection between the judge and Krying Kursten" (Exhibit D), implying

impropriety; and Defendant Boyce's own assertions that the case is "a total circus...a waste of tax dollars," escalates the risk of further violations and challenges the Court's legitimacy and ability to enforce its orders.

- 16. Defendant Boyce's public statement that the case is "a total circus...a waste of tax dollars" underscores her willful disregard for this Court's authority, its proceedings, and its orders, and shows that further violations are likely absent strong Court intervention.
- 17. Given this ongoing, foreseeable harm, the situation demands immediate judicial intervention to halt further damage and additional contemptuous conduct.

Plaintiff respectfully requests that the Court:

- 1. Consider this supplemental evidence as part of the pending Emergency Motion for Order to Show Cause,
- 2. Recognize the increased urgency necessitating swift judicial action due to ongoing incitement and harm first instigated and now facilitated by Defendant Boyce, and
- 3. Issue appropriate relief and sanctions reflecting both the direct harm to Plaintiff and the broader undermining of the Court's authority.

Declaration

I, Kursten Owen, declare under penalty of perjury pursuant to the laws of the

United States and Oregon that the above is true and correct to the best of my

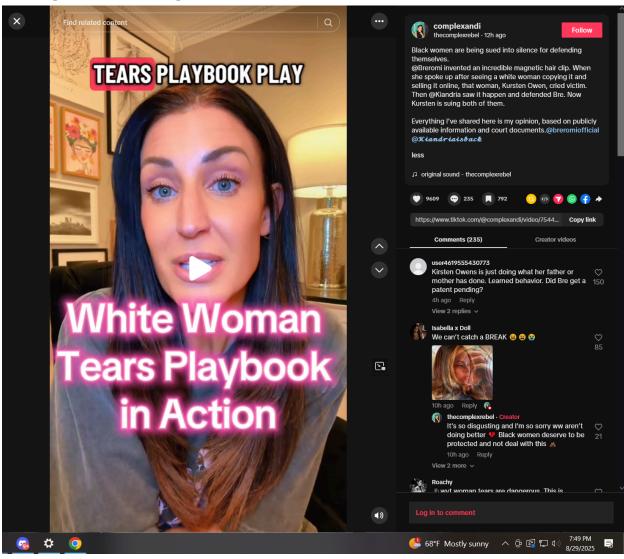
knowledge and belief and that all attached exhibits are true and authentic copies.

Dated: 8/29/2025

/s/ Kursten Owen

Kursten Owen

Exhibit A
Thecomplexrebel Transcripts



00:00:00:00 - 00:00:18:13

thecomplexrebel

You want to see the white woman playbook play out in real time? First things first. Everything I'm about to say is totally my own opinion, based on my own observations of publicly available information and court documents. A black woman named Bre invented this amazing magnetic hair clip that is designed to be a low tension clip that is designed specifically for locs.

00:00:18:14 - 00:00:40:14

thecomplexrebel

Another woman named Kursten Owen allegedly copied her design, mimicked Bre's entire marketing and when Bre saw this, she was like, hey, what the hell? Spoke up about it.

What did Kursten do? Did Kursten take accountability? Absolutely no. She's a white woman, remember? We don't take accountability, we have a hard time with that. No. Kursten started crying victim saying that Bre is literally bullying her.

00:00:40:15 - 00:01:02:02

thecomplexrebel

Enter Kiandria. If you guys don't know Kiandria, she is a fucking incredible woman. She's a black activist. This woman right here. She saw all of this going down, and she's like hell no. And she spoke up. She went to Bre's defense. And then what happened? Kursten is suing both of them. Kursten's suing both of them. Within six days before, Bre or Kiandria had even been served.

00:01:02:03 - 00:01:20:07

thecomplexrebel

A federal judge gave a gag order. Even a UCLA law professor flagged that order as constitutionally shaky. Here's something else. I'm talking about this with my 16 years. We're looking through Kursten shop, and immediately, you know what my 16 year old says? These all look like knockoffs. They all just look like 3D printed versions of other people's stuff.

00:01:20:13 - 00:01:40:03

thecomplexrebel

Allegedly, based on my observations, this is my opinion. But this is what modern colonization looks like. No? The invention is stolen. It's stolen from a black woman. The black woman then gets demonized, is getting demonized by a white woman. The white woman is weaponizing the legal system to silence her. And here's the thing. That court order might have gagged Bre and Kendra.

00:01:40:04 - 00:01:53:22

thecomplexrebel

But you know what, Kursten? You cannot silence me. So I'm going to say your name again. Kursten Owen I see what you're doing? We all see what you're doing. Support Bre's business. She's incredible. I'll link it in the comments. Stand with Kiandria. Share this story so it doesn't get buried.

Exhibit B- Older Comment Directing at Plaintiff by the complex rebel:



Exhibit C- Comments under the complex rebel's video reporting Plaintiff

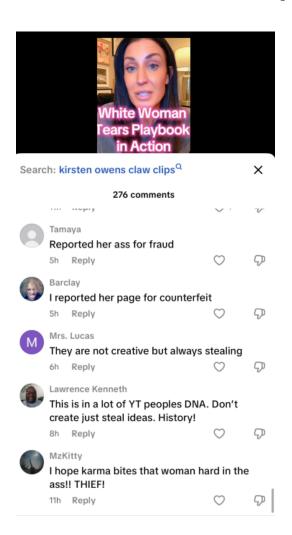
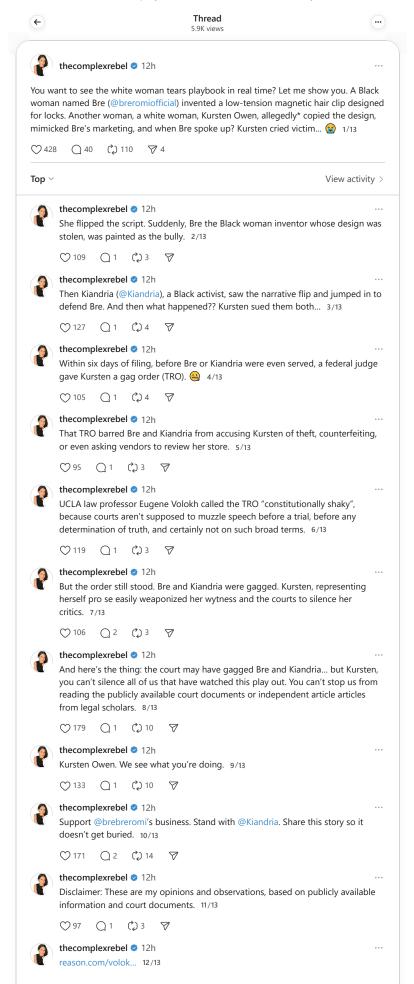




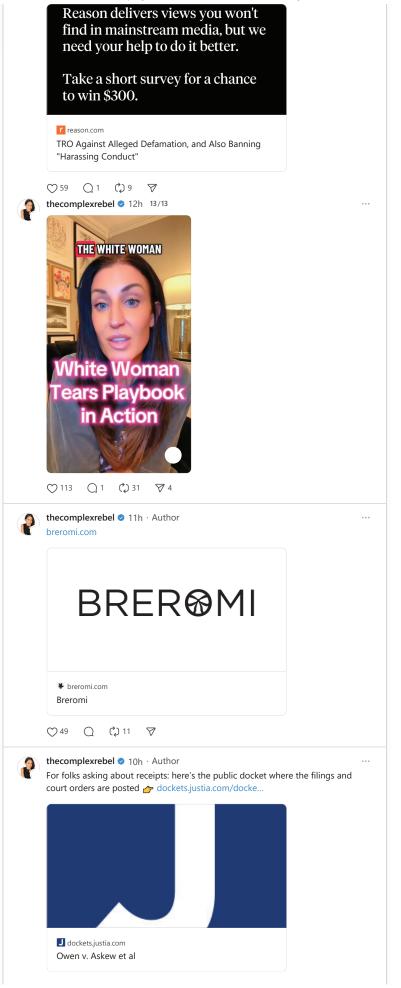
Exhibit D





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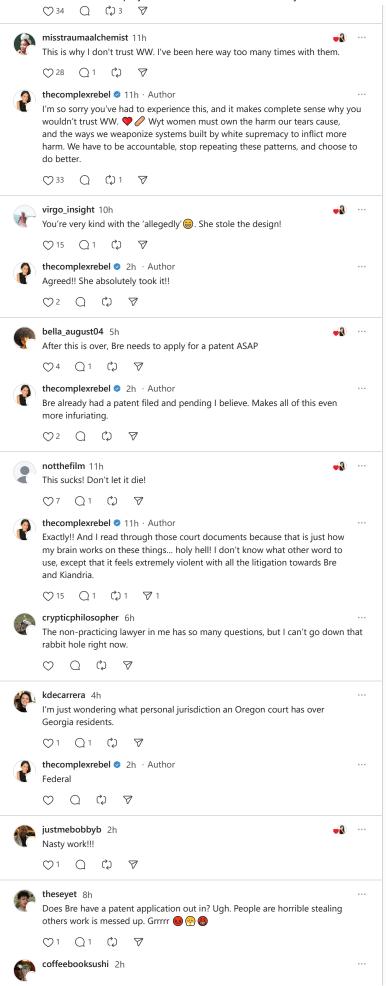
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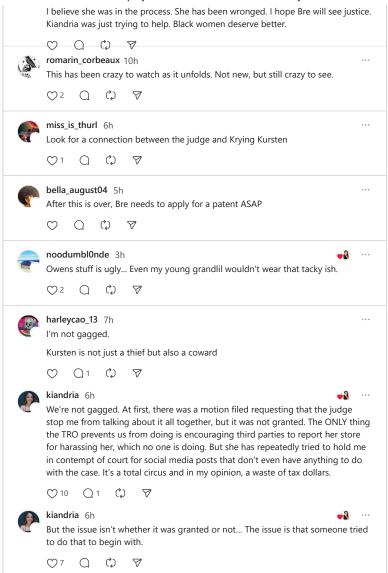


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You want to see the white woman tears playbook in real time? Let me show you. A Black woman named Bre (@breromiofficial) inve...

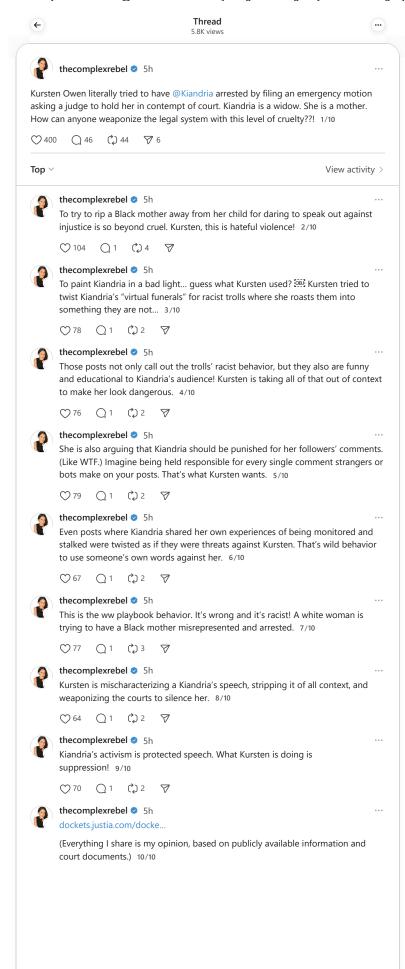


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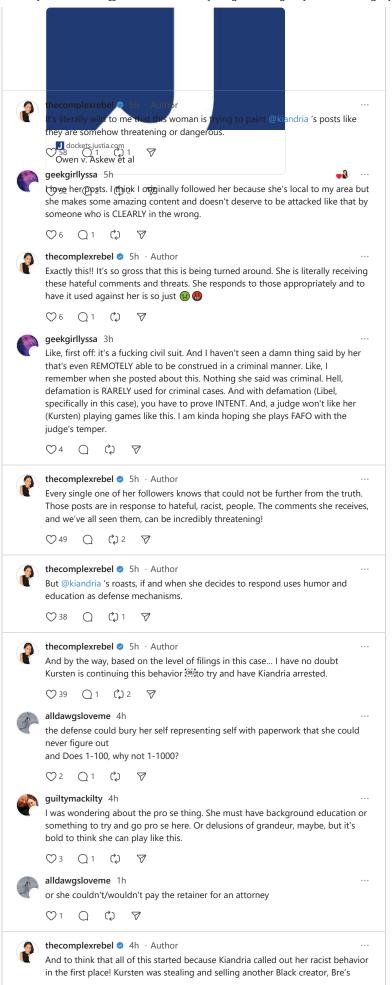




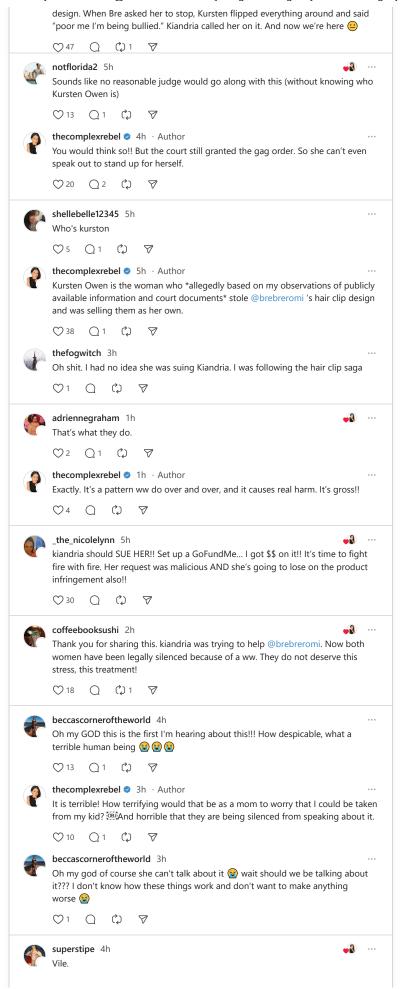














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